

## Health and Safety Policy Group

<b>Policy Reference:</b>	<i>A73</i>
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<b>Applies to:</b>	<i>All services</i>
<b>Associated documents:</b>	<i>A-Z Arrangements</i>
<b>Approved by:</b>	<i>Head of Health and Safety</i>
<b>Implementation date:</b>	<i>September 2023</i>
<b>Next review due by:</b>	<i>September 2024</i>
<i>This policy has been reviewed to ensure it promotes safeguarding and does not present barriers to participation or disadvantage any protected groups</i>	

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## 0. Summary of changes since previous version of policy

Health and Safety Policy Statement (page 4) updated signature date, please print and post on relevant notice boards.

Added responsibilities for the Health and Safety Advisor position.

## 1. Aims

Aurora are an innovative provider of education, care and support for children, young people and adults with special educational needs and disabilities. We have a growing number of schools, colleges and homes across the UK providing a wide range of services and facilities.

Our shared commitment across the group is to maximise opportunities for each individual to fulfil their potential, by making the most of their talents and creating outcomes that suit their unique set of skills and abilities. We work in partnership with each child, young person and adult to deliver personalised education, care and support, which meets each individual's needs and aspirations.

The policy should be read in conjunction with applicable risk assessments, policies and procedures, as well as where appropriate reference materials, guides or rules applicable, such as safe systems of work, permits to work, induction or specific training provided or other documentation or verbal instructions applicable to specific areas or subjects.

That staff, children and young people and others as affected are provided with a safe and healthy living and/or working environment by making sure that risks, particularly the risks to staff children and young people are managed so far as is reasonably practicable.

This health and safety policy is a 'living' document evolving over time, e.g. in the light of major organisational changes such as restructuring or a significant acquisition.

## 2. Legislation and statutory requirements

The Health and Safety at Work etc. Act 1974

<https://www.hse.gov.uk/legislation/hswa.htm>

<https://www.legislation.gov.uk/ukpga/1974/37/contents>

<https://www.hse.gov.uk/simple-health-safety/index.htm>

The Education (Independent School Standards) Regulations 2014\*

<https://www.hse.gov.uk/services/education/index.htm>

HSE Education

<https://www.gov.uk/guidance/good-estate-management-for-schools/health-and-safety>

Roles and Responsibilities (HSE The Role of School Leaders who does what)

<https://www.hse.gov.uk/services/education/sensible-leadership/school-leaders.htm>

## 3. Scope

### Health and Safety Policy Statement

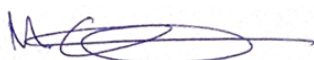
The Aurora Group recognises and accepts its duty to put suitable arrangements in place to manage health and safety whilst taking a common sense and practical systematic approach. The Group will put in processes to protect staff, pupils, children, young people, contractors, visitors and any other person who may be affected by their work as are reasonably practicable. The Group also recognises that every safeguarding incident, accident, dangerous occurrence, error and disease, however slight is a matter of concern.

The Health and Safety Policy for the Group shall through a sustained approach:

- Effectively manage health and safety through
  - › leadership and trained medically fit management and staff
  - › a trained skilled workforce
  - › an environment where people are trusted and involved
- Make suitable and sufficient assessment of risks to staff, children, young people, contractors and any other people who could be affected by the activities of the Group.
- Put in place arrangements for the effective planning organisation control monitoring and review of the preventative and protective measures that come from risk assessment.
- Provide the Group with access to competent health and safety advice.
- Provide clear information about the risks in the workplace to staff, how they are protected and how to follow any emergency arrangements.
- Instruction and adequate training, for staff to ensure are competent to do their work and how to deal with risks.
- Ensure there is adequate and appropriate supervision in place.
- Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace.
- To take all necessary measures to establish the causes of accidents and impairments to health occurring throughout the Group and to institute all practicable remedial measures to prevent recurrence.
- To ensure first aid is administered in a timely and competent manner by the drawing up of and the effective implementation of written first aid arrangements outlined within this policy document.
- Engage and consult with staff on health and safety conditions, their risks at work and current preventative and protective measures, face to face, bulletins and toolbox talks.
- Implement emergency procedures – evacuation in case of fire or other significant incident.
- Maintain safe and healthy living, learning and working conditions, provide and maintain aids, furniture, plant and equipment including any new machinery introduced. Always ensure safe storage/use of chemical substances.
- Take appropriate action to reduce and manage safeguarding risks that are identified.
- Monitor and review through active and reactive methods.

This health and safety policy is subject to annual review

Signed Chief Executive Officer:



Date: September 2022

## 4. Roles and Responsibilities

This section sets out who is responsible for specific actions. These responsibilities will be reflected in job descriptions.

### 4.1 Chief Executive Officer:

1	To understand the relevant health and safety legislation and statutory requirements by completing the IOSH Leading Safely course.
2	Set the direction for effective health and safety management by setting targets to help define what the Board is expected to achieve
3	Delegate day to day HS management to Chief Operating Officer

### 4.2 Chief Operating Officer:

1	To understand the relevant health and safety legislation and statutory requirements by completing the IOSH Leading Safely course.
2	Set the direction for effective health and safety management by setting targets to help define what the Board is expected to achieve
3	Put in place and introduce management systems and practices that have sensible, responsible, proportionate approaches to health and safety, with clear policies that focus on the real risks, and do not encourage unnecessary paperwork
4	Implement arrangements that manage the risks to staff, children, young people and visitors who may be affected by the school's, and regulated provider activities.
5	Tell our staff about the real and significant risks in their workplace and the precautions they need to take to manage them.
6	Make sure our staff have the relevant information and training to manage risks on a day to day basis, including access to competent health, safety and fire advice where needed
7	Check that the control measures have been implemented and remain appropriate and effective through effective monitoring and reporting
8	Make a formal regular review of health and safety performance, practices policies and procedures to ensure they remain effective and ensure they do not discriminate against children and young people with a protected characteristic. The Group recognise children and young people's needs and Group business activities may vary over time and needs to be sufficiently flexible in our policies to accommodate these. (Reviewed at monthly HS meetings and monthly board meetings).
9	Consider immediate reviews in the light of major shortcomings or events
10	Consider health and safety when deciding senior management appointments
11	Setting up a separate risk and assurance committee and health and safety committee as a subset of the board, chaired by a senior executive, to make sure the key issues are addressed and guard against time and effort wasted on trivial risks and unnecessary bureaucracy.

## 4.3 The Executive Team:

Health and safety responsibilities have been assigned to all directors

1	Own and understand the key issues involved
2	Contribute to the health and safety agenda at board meetings
3	Support the Quality Assurance Director and the Head of Health and Safety in their efforts to drive continuous improvement to raise standards and ensure compliance
4	Consider the health and safety implications of introducing new processes, new working practices or new personnel, dedicating adequate resources to the task and seeking advice where necessary
5	To 'design-in' health and safety when implementing change
6	Address any breaches immediately
7	To monitor health and safety performance reports
8	Have oversight of behavioural change programme and audits
9	Publish annual health and safety targets and devising initiatives to meet them
10	Carry out periodic reviews of health and safety performance to examine whether <ul style="list-style-type: none"> <li>&gt; H&amp;S Policy reflects current priorities plans and targets</li> <li>&gt; The adequacy of reports made to the board</li> </ul>
11	Decide on weaknesses to a system decide actions to address them and monitor their implementation
12	Consider immediate reviews in the light of major shortcomings or events
13	Keep the independence and objectivity of audits (internal and external) under review

## 4.4 Quality Assurance Director:

To ensure the clearest visibility of leadership, Service Leads will support the Group Quality Assurance Director within each site.

1	To understand the relevant health and safety legislation and statutory requirements and ensure each estate within the Group complies with appropriate statutory and regulatory standards
2	Implement a framework for health and safety
3	To oversee and ensure periodic strategic risk profiling audits of the effectiveness of management structures, risk controls for health and safety are carried out and actions monitored
4	Chair the risk and assurance committee and health and safety committee as a subset of the board, and to make sure the key issues are addressed and guard against time and effort being wasted on trivial risks and unnecessary bureaucracy
5	Arrange the provision of health and safety training to some or all of the board to promote understanding and knowledge of the key issues in the Group
6	To appoint one or more competent persons to support compliance with the regulations. This includes those relating to maintenance and construction work.
7	To bring to the attention of the COO any major shortcomings or events

8	To support the involvement and creation of working partnerships with employees by overseeing the appointment and implementation of Service Leads to actively monitor improvements and take action
9	To provide and make regular reports on the health and safety performance and actions of contractors to the Board to confirm the Group is complying with all necessary legal requirements relating to the occupation of the estate, including health and safety law and other relevant laws and regulations
10	Include an assessment of employees for whom they are responsible and their contribution to health and safety performance as part of their appraisal
11	To make extra 'shop floor' visits to gather information for the formal review and assessment
12	Ensure that the health and safety policy and performance of the Group is periodically reviewed
13	Ensure where appropriate by delegation to the Head of Health and Safety, that the implementation of strategic health and safety initiatives is effectively managed and coordinated
14	When statutory insurance inspection reports are received by the Group, any corrective action identified is completed in the time scale specified, or that the equipment is taken out of service.
15	To understand and maintain documented evidence of compliance across the whole estates within the Group

#### 4.5 Estates Director:

1	To understand the relevant health and safety legislation and statutory requirements and ensure each estate within the Group complies with appropriate statutory and regulatory standards
2	To develop oversee and keep under review on behalf of the Group for each estate an <ol style="list-style-type: none"> <li>3 Estate vision</li> <li>4 Estate strategy</li> <li>5 Asset management plan</li> <li>6 Feedback from Regional Estates Managers</li> </ol>
3	To bring to the attention of the Quality Assurance Director and the COO in the light of major shortcomings or events
4	Oversee the appointment and implementation of Regional Area Estate Managers to actively monitor improvements and take action in order to manage and coordinate the planned programme of maintenance across the Group effectively
5	Have procurement standards for goods, equipment and services to help prevent the introduction of expensive health and safety hazards.
6	Assess the health and safety arrangements of partners, key suppliers and contractors; their performance could adversely affect the Group activities.
7	To provide and make regular reports on the health and safety performance and actions of contractors to the Board to confirm the Group is complying with all necessary legal requirements relating to the occupation of the estate, including <ul style="list-style-type: none"> <li>&gt; Health and safety law and other relevant laws and regulations as they apply to estate management and property</li> <li>&gt; Planned preventative maintenance</li> <li>&gt; Statutory inspection and testing</li> </ul>

8	Include an assessment of employees for whom they are responsible and their contribution to health and safety performance as part of their appraisal
9	To make extra 'shop floor' visits to gather information for the formal review and assessment
10	To ensure adequate arrangements are in place for the maintenance of Group services, facilities and buildings and there is a programme of planned preventative maintenance in operation
11	To ensure adequate arrangements for statutory inspections to be undertaken on plant and equipment and for the retention of required inspection records.
12	To ensure maintenance data is held on an accessible easily retrievable system
13	When statutory insurance inspection reports are received by the Group, any corrective action identified is completed in the time scale specified, or that the plant is taken out of service.
14	To understand and maintain documented evidence of compliance across the whole estates within the Group as it applies to estates facilities plant machinery and property management

#### 4.6 Head of Health and Safety:

The Head of Health and Safety is appointed as the Group's 'competent source of advice' under The Management of Health and Safety at Work Regulations. This role is further supported by competent consultants for fire and water management and a Health and Safety Advisor.

1	To understand the relevant health and safety legislation and statutory requirements as they apply to the Group activities and the Education sector and the adult and children care sectors
2	To review the Health and Safety Policy and Codes of Practice and prepare for new legislation, which may affect the Group
3	Compile the following for the COO and the Quality Assurance Director <ul style="list-style-type: none"> <li>• Feedback on the implementation of the actions and targets identified in the Risk Registers</li> <li>• Feedback on the health and safety training programme (take up and need)</li> <li>• Reports on Policies procedures that need to be introduced</li> <li>• Accident and incident statistics summary (based upon the information received from the Governance Officer)</li> <li>• Revisions required to the Group Health and Safety Policy and associated Codes of Practice</li> <li>• Shortfalls identified that have an impact on governance</li> </ul>
4	Carry out periodic audits (regulatory compliance, formal and topic specific) of the effectiveness of management structures and risk controls for health and safety are carried out
5	Regularly with the appropriate service staff, physically inspect the area for which he/she has responsibility completing an assessment or checklist as to the conditions identified and any action to be taken
6	Arrange regular meetings with relevant staff to discuss accident prevention, safety performance, and improvements to the Health, Safety Policy or safety instructions
7	To bring to the attention of the Quality Assurance Director and the Estates Director in the light of major shortcomings or events
8	Monitor and review the safety performance of the Group, including accident incident statistics, training courses, inspection reports.



9	Liaison as necessary takes place with outsourced Health and Safety Consultant and others giving assistance and input to meet with compliance
10	Carry out and give support to relevant delegated staff to perform investigations into accidents incidents and diseases and those reportable to the relevant authority
11	Assist with the evaluation of and monitoring of contractors where required
12	Give telephone support to the Group during working hours
13	Assist management in any dealings with the Enforcement Authorities
14	To carry out risk assessments and develop safe systems of work, method statements where required
15	To ensure relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)
16	To stop work in the event of a danger of life or limb
17	To work with the Director of People, the Quality Director, Estates Director and the Group Learning and Development Manager to oversee health and safety training across the organisation
18	To deliver training and toolbox talks to staff as required
19	Ensure that the group health and safety policy, and other health and safety related policies and risk assessments are in place at each site and are followed.

#### 4.7 Health and Safety Advisor:

The Health and Safety Advisor will support the Head of Health and Safety in managing health and safety for the group.

1	To understand the relevant health and safety legislation and statutory requirements as they apply to the Group activities and the Education sector and the adult and children care sectors
2	To review and prepare for new legislation, which may affect the Group
3	Supporting the sustained culture across the company, which embeds individual ownership of, and behaviour related to, Health and Safety.
4	Carry out periodic audits (regulatory compliance, formal and topic specific) of the effectiveness of management structures and risk controls for health and safety are carried out
5	Regularly with the appropriate service staff, physically inspect the area for which he/she has responsibility completing an assessment or checklist as to the conditions identified and any action to be taken
6	Attend all service monthly health and safety meetings with relevant staff to discuss accident prevention, safety performance, and improvements to the health, safety.
7	To bring to the attention of the Head of Health and Safety in the light of major shortcomings or events at any service.
8	Support in the monitoring and review the safety performance of the Group, including accident incident statistics, training courses, inspection reports.

9	Carry out and give support to relevant delegated staff to perform investigations into accidents incidents and diseases and those reportable to the relevant authority
10	Assist with the evaluation of and monitoring of contractors where required
12	Give telephone support to the Group during working hours
13	Assist management in any dealings with the Enforcement Authorities
14	To carry out risk assessments and develop safe systems of work, method statements where required
15	To ensure relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)
16	To stop work in the event of a danger of life or limb
17	To deliver training and toolbox talks to staff as required
18	Ensure that the group health and safety policy, and other health and safety related policies and risk assessments are in place at each site and are followed.

#### 4.8 Chief Finance Officer:

1	To make available the provision of adequate funds and resources to meet the requirements and arrangements of this policy and the associated Health, Safety, Environmental and Welfare legislation on an annual basis and ensure that such sums are reviewed annually
2	To include in their financial planning the capital and revenue costs of maintaining safety.
3	To ensure that financial control procedures are in place e.g. require that tenders for contract work are rejected where it is not determined that the contractors concerned are not competent, or are inadequately resourced or managed to undertake the proposed works safely
4	To prioritise expenditure and challenge value for money
5	To ensure suitable emergency resources are available as part of contingency planning

#### 4.9 Director of People:

1	To carry out effective monitoring of sickness absence and workplace health and alert the board to underlying problems that could seriously damage performance or result in accidents and long-term illness
2	Liaise with the Learning and Development Manager for the assessment and implementation of appropriate health and safety training of staff, at induction and at regularly as required in relation to specific job needs and that there are adequate arrangements for keeping health and safety training records within the business.
3	Ensure Human Resources management standards adequately reflect legal requirements for health and safety and are consistent with the Group Health and Safety Standards and procedures/ Human Resources policies.
4	Ensure the sourcing and effective provision of occupational health surveillance and management for staff and, in particular

	<ol style="list-style-type: none"> <li>1. To ascertain whether or not any potential candidate with a disability needs reasonable adjustments to be made to the recruitment process (not the role) to allow them to participate</li> <li>2. To determine if the candidate can carry out a function that is intrinsic to the role, which may, in turn, reveal health issues*.</li> </ol>
4	To support the Proprietor in their attempt to carry out appropriate checks to confirm in respect of each such person the persons medical fitness under The Education (Independent School Standards) Regs 2014
5	Make arrangements for the implementation and maintenance of appropriate health surveillance programmes, records and that these are maintained, including undertaking specific risk assessments where appropriate following assessment
6	Implement adjustments or modifications for groups that may require adaptations, such as young people, inexperienced staff, those with existing health conditions, with disabilities or that may notify the organisation of pregnancy.
7	Appointing and referring staff to an outsourced competent occupational physician as and when appropriate
8	To challenge, and where appropriate instigate disciplinary procedures, for breaches of the health and safety policy.

\* Note: This exception is narrow and only relates to a function which is “absolutely fundamental” to the role. The example used by the Equality and Human Rights Commission (EHRC) is that of a candidate for a scaffolder role being asked about their ability to climb scaffolding at height.

#### 4.10 Service Level Governance:

The governing body at site level have a key part to play in tackling risk aversion, helping to provide a wider sense of perspective and helping the residential care homes, schools and colleges to get the balance right on managing risk.

1	Take reasonable steps to make sure that the service is following the employer's policy and procedures e.g. through regular discussion at governance meetings
2	Ensure that staff receive adequate training to enable them to carry out their responsibilities.
3	Promote a sensible approach to health and safety, making use of competent health and safety advice when required
4	Work in close partnership with the site lead and site leadership team to support sensible health and safety management and to challenge as appropriate.

#### 4.11 Operations Directors and Service Leads:

The Site Lead has considerable autonomy in the day-to-day running of their sites. It is important to exercise this autonomy in line with the Group's policies, procedures and standards. The Operation Director will assist, support and oversee the health and safety of each site.

1	Familiarise themselves with the requirements of the law as it relates to risk including Occupational Health and Safety and the independent education and care sectors.
2	Ensure that the site is following the Group's health and safety policy and has effective arrangements for managing the real health and safety risks
3	Maintain effective communications with employers, governors, and the workforce, give clear information to children, young people and visitors, including contractors, regarding the significant risks on site.
4	Receive copies of reports from the Head of Health and Safety take action to rectify shortfalls

5	Make sure that the staff have the appropriate training and competencies to deal with risks in their areas of responsibility
6	To involve workers and communicate, so that everyone is clear on what is needed and can discuss issues – develop positive attitudes and behaviours
7	Appoint consult and work with recognised safety representatives/employee representatives and safety committees
8	Make sure that staff understand their responsibilities and know how to access support and advice to help them manage risks responsibly
9	Provide visible leadership to the whole site so that staff feel motivated, supported and empowered to focus on the things that really matter
10	Report and investigate accidents incidents and any dangerous occurrences
11	To get actively involved in the monitoring programme
12	Collating accident and safeguarding data for the Quality and Governance Administrator at required intervals and inform HR of absences that are to be notified to CQC so their absence can be planned for.
13	Include an assessment of employees contribution to health and safety performance
14	To challenge, and where appropriate instigate disciplinary procedures, for breaches of the health and safety policy.
15	To ensure relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change).
16	Deliver and manage the health and safety management system.
17	To ensure that the employees under their supervision have the relevant qualifications, skills, experience and training to carry out the role.
18	To involve workers and communicate, so that everyone is clear on what is needed and can discuss issues – develop positive attitudes and behaviours
19	Appoint, consult and work with recognised safety representatives/employee representatives and safety committees
20	To challenge, and where appropriate instigate disciplinary procedures, for breaches of the health and safety policy.
21	To get actively involved in the monitoring programme
22	Include an assessment of employees contribution to health and safety performance
24	Ensuring all health and safety policies, procedures are in place.
25	To ensure an accessibility plan is in place liaising with the Estates Team where necessary

#### 4.12 Business Managers:

The Group understands health and safety is to concentrate on the real risks and involve staff in the process of finding practical and sensible solutions.

The Site Lead can delegate to the business manager health and safety responsibilities and they have sufficient authority to take the lead responsibility for health and safety and have time, resource and competence to fulfil the role.

1	Familiarise themselves with the requirements of the law as it relates to risk including Occupational Health and Safety and the independent Education sector.
2	Take the lead for health and safety on site acting as the focal point for the Site's health and safety management arrangements

3	Receive copies of reports from the Head of Health and Safety take action to rectify shortfalls
4	Ensure the management and monitoring of purchasing and contracting procedures to ensure risks are effectively managed
5	Advise contractors of site specific risks and oversee their activities on site
6	Ensure staff and visitors are aware of the on-site procedures and the precautions to follow
7	Report and investigate accidents and any dangerous occurrences
8	Get actively involved in the monitoring programme
9	Involve workers and communicate, so that everyone is clear on what is needed and can discuss issues – develop positive attitudes and behaviours
10	Appoint consult and work with recognised safety representatives/employee representatives and safety committees
11	Include an assessment of employees contribution to health and safety performance
12	Implement monitor and review training procedures
13	Prepare of reports and returns for the leadership team
14	Challenge, and where appropriate instigate disciplinary procedures, for breaches of the health and safety policy.
15	Ensure relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)
16	Ensure the monitoring programme is in place and act on shortfalls <ul style="list-style-type: none"> <li>• Carry out inspections</li> <li>• Carry out tests and checks as per instruction and training</li> <li>• Maintain the information on the notice boards</li> <li>• Ensure monthly H &amp; S meetings take place, with minutes sent to governance in a timely manner</li> </ul>
17	To consult and work with recognised safety representatives/employee representatives and safety committees
18	To provide guidance and support to employees as they carry out their activities and tasks and ensure that they follow the risk assessment guidance and safe systems of work.
19	To supervise staff to make sure health and safety arrangements are followed

#### 4.13 Line Managers:

1	To get actively involved in the monitoring programme and act on shortfalls <ul style="list-style-type: none"> <li>• Carry out inspections</li> <li>• Carry out tests and checks as per instruction and training</li> <li>• Maintain the information on the notice boards</li> </ul>
2	Consult and work with recognised safety representatives/employee representatives and safety committees.
3	To ensure relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)

4	To provide guidance and support to employees as they carry out their activities and tasks, ensure that they follow the risk assessment guidance and safe systems of work.
5	To supervise staff to make sure health and safety arrangements are followed

#### 4.14 Employees:

The Group recognise all of the workforce play an important part in sensible health and safety management in their workplace. Staff involvement makes a vital contribution towards achieving safer and healthier workplaces, and helps develop sensible rather than over cautious approaches. When developing learning opportunities, the focus should be on controlling the real risks, not eliminating all risks. Health and safety is about doing things safely, not finding reasons not to do so.

1	Take reasonable care for your own health, safety and that of others who may be affected by what you do, or fail to do.
2	Cooperate with the Group (the employer), fellow members of staff, contractors and others to enable them to make and keep the workplace safe.
3	Raise health and safety concerns in line with local arrangements.
4	To ensure that all children and young people on the premises are not put at risk
5	To take care of visitors and others when having meetings on the premises, ensuring that they are not put at risk, are aware of hazards on the premises and follow the emergency procedures if necessary
6	To report any accidents, assaults, near misses and defects damage using the correct reporting procedure.
7	To use any work equipment, supplied by the group, following the manufacturers guidance and instructions.
8	To follow any direction or advice given in training relating to health and safety.
9	To use any supplied PPE correctly
10	To set an example for others to follow.
11	Take a sensible approach to complete relevant risk assessments for which they are responsible by focusing on how the real risks are managed and actions arising out of those assessments implemented. (Risk assessments reviewed when teaching habits or conditions change.)
12	Where appropriate take into account and make use of - information sheets on safety, teaching and learning resources developed by CLEAPSS
13	To ensure children and young people are supervised and safeguarded
14	To get actively involved in the monitoring programme and act on shortfalls e.g. complete classroom assessments and make checks where children and young people learn and play.
15	To consult and work with recognised safety representatives/employee representatives and safety committees
16	To seek assistance and advice from the Head of Health and Safety where appropriate

#### 4.15 Contractors:

1	Have their own health and safety policy. However, for those companies who employ fewer than 5 it is acknowledged that this policy does not have to be written or recorded. Contractors however must, as Employers, keep to the "spirit and intention" of a policy and still have a legal duty to comply with all Health and Safety legislation as set out in the policy statement of this document.
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2	Contractors, as Employers, must also assess and control any risks they create, and to inform all the other Companies with whom they share the work place what control measures they are adopting to minimise the risk of injury to other personnel. These assessments must be recorded if the Contractor employs more than 5 Employees.
3	To provide documentation in a timely manner before works starts and upon request
4	Adhere to the same management standards as the Group
5	To check controls are working and standards are being implemented and to learn from mistakes after things go wrong
6	To have oversight over their employees and people they appoint including sub-contractors and freelance workers who they appoint
7	To inform their Employees and sub- contractors who they appoint to work on the project about risks to which they might be exposed when sharing the work place with them before work activities commence.
8	Use their own tools and equipment (where practical) that are fit for their intended purpose and used in a safe manner.
9	To assess the competency of and manage sub-contractors and self- employed people under their control.
10	To monitor so far as is reasonably practicable the work activities of both their own employees and those sub- contractors under their control and remain generally aware of their health and safety performance.
11	To report accidents incidents and near misses to the Group in writing on an Accident Report Form.
12	To put into place supervision and monitoring arrangements for work carried out.
13	<p>Principle Contractor Responsibilities</p> <p>Principle Contractors plan, manage, monitor and coordinate health and safety in the construction phase of a project. This includes:</p> <ul style="list-style-type: none"> <li>• liaising with the client and principal designer</li> <li>• preparing the construction phase plan - A form is available free from the CITB <a href="http://www.citb.co.uk">www.citb.co.uk</a></li> <li>• organising cooperation between contractors and coordinating their work.</li> </ul> <p>Ensure:</p> <ul style="list-style-type: none"> <li>• suitable site inductions are provided;</li> <li>• reasonable steps are taken to prevent unauthorised access;</li> <li>• workers are consulted and engaged in securing their health and safety; and</li> <li>• welfare facilities are provided</li> </ul>

## 5. Definitions

N/A

## 6. Management Arrangements

### 6.1 Leadership

The Group has aligned its health and safety risk management system to the Plan Do Check Act and HSG 65 guidelines in order to achieve a balance between the systems and behavioural aspects of

management, treating safety management as an integral part of good management generally rather than a stand-alone system.

The Group is committed to visible leadership and to improve health and safety performance. Health and safety responsibilities have been assigned to all directors as documented in this Policy document. All directors are expected to own and understand the key issues involved within the Group and decide how best to communicate, promote and champion health and safety. Health and safety will appear regularly as an agenda item at Board meetings.

The Group has nominated the Quality Assurance Director as the Health and Safety Committee Lead to

- Communicate promote health and safety.
- To give focus at Board and ensure they are aware of the key health and safety issues.
- To ensure an effective response to health and safety information reported.

The Quality Assurance Director has delegated authority from the Board to further formulate, develop and install the safety management system using the Plan Do Check Act approach using the Head of Health and Safety as the Group's source of health and safety advice and assistance. Local Service Leads have responsibility for health and safety on site.

Additional resources have been made available for additional support, expertise and competent cover for absences as the Board deem fit e.g. by the ongoing provision of outsourced specialist consultancy support.

## 7. Plan

### 7.1 Policy Formulation & Standard Setting

The Health and Safety Policy, other supporting policies, associated standards, codes of practice and supporting guidelines that are formulated and set for the Group are written and revised wherever possible by someone within the Group unless there is a justifiable reason not to e.g. lack of knowledge specialist insight or expertise.

Policies are consulted revised approved and signed off by the COO in line with the Quality Management system and policy procedure overseen by the Quality Assurance Director. Policies are subject to consultation and are written in English to ensure they are clearly understood by the workforce.

All Policies are subject to internal audit in line with a planned programme and the Quality Audit Policy and external auditing as applicable to ensure compliance with stated objectives.

Service Leads & Managers are not permitted to develop policies without authority or formal approval. Where there is a requirement for a policy it is to be notified to the Quality Assurance Director without delay.

Some of the arrangements within this policy are further supported by procedure documents and guidelines as referenced and should be read in conjunction with the relevant arrangement to give clarity. The Quality department will retain an up to date master list of documents referred to in this policy and make these available on the company intranet.

This health and safety policy is subject to annual review in compliance with the Quality Management system but considered to be a 'living' document evolving over time, e.g. in the light of major organisational changes such as restructuring.



## 7.2 Planning

It is the responsibility of Quality Assurance Director to develop and install the safety management system on behalf of the COO and the Board, using the Head of Health and Safety as the source of health and safety advice support guidance.

Proper planning is essential for the implementation of this health and safety policy. The Group health and safety risk management plans have the following aim

- Control risks including health risks that may only become apparent after long period of time
- React to changing demands
- Sustain positive health and safety attitudes

The H&S requirements and the setting of targets to help define what the board is seeking to achieve come from and are identified through a number of main areas:

- Instruction from the COO and the Board
- Risk Registers identifying priorities, the biggest risks and what risk control measures are needed)
  - › The nature and level of the risks faced by the Group and locally
  - › The likelihood of adverse, affects occurring
  - › The level of disruption and costs
  - › The effectiveness of the controls in place to manage those risks
- The Quality Assurance Director
- Estates Director
- Objectives that need to be implemented as they relate to health and safety
- Regulatory compliance and other external requirements and legal change that affects the Group
- Insurance
- Education sector, government guidelines, associations and periodicals and Care sector
- Health and safety hazards within organisational control/identified by others as affecting work activity
- Information received from the Head of Health and Safety and specialist input
- Commissioners of Service (Referring Organisations)
- People who we support
- Emergency response requirements

Plans will be revisited

- Annually as part of a formal process
- When changes have taken place e.g. working processes, curriculum, staff, introduction of new service support criteria
- Following accident investigations, within the Group and where lessons have been learned from others as it relates to the sector
- Following consultation with formal staff representatives, Board health and safety lead, Group Health and Safety Manager
- If new information is received e.g. from manufacturers or others in the same sector

Plans are discussed with staff or their representatives and communicated so that everyone knows what is required.

Planning arrangements include local estate operational plans for but not limited to:

- Estate Risk Registers Actions
- Maintenance Plan
- Training Plan

## 7.3 Budget and Resources

The Chief Financial Officer allocates an annual budget to ensure the Group health and safety management system is suitably resourced and keeps this under review in conjunction with the Quality Assurance Director.

The Estate Director implements and oversees the 3-5 year budget plan for each estate under Group control.

Emergency financial resources as part of contingency planning will be made available by Director of Finance subject to its formal approval.

## 8. Do

### 8.1 Risk Profiling

#### 8.1.2 Group Risk Registers:

The Group has put in place Risk Registers documenting risks corporately and for each site to address

- the greatest health and safety issues and levels of threat
- the likelihood of adverse effects occurring
- the level of disruption and the effectiveness of the control measures in place

Where it is identified by Service Leads that hazards and risks are not managed effectively the Head of Health and Safety is to be notified and the register revised and updated.

The high priority actions are prioritised and monitored by the Head of Health and Safety and Service Leads until they are actioned and to ensure compliance. Local staff consultation forums keep the registers under review.

### 8.2 Risk Assessment

Relevant risk assessments are completed and actions arising out of those assessments implemented. Risk assessments are reviewed when working habits or conditions change. Staff with the responsibility to carry out risk assessments (general specialist or otherwise) will be competent and suitably skilled to do so. Special risk assessments where they apply are identified within the arrangements of this policy document. When writing or reviewing a risk assessment follow guidance in the Group Risk Assessment policy (A88).

#### 8.2.1. Risk Assessment Process & Procedure

The Group recognise that there is not only one way to do risk assessment as there are no fixed rules about how a risk assessment should be carried out.

The most straightforward way to control risks must be considered wherever possible.

- identifying what can harm people in your workplace
- identifying and deciding who might be harmed and how (whilst remembering that certain groups may be at increased risk e.g. young or inexperienced staff, pregnant staff, workers with a disability, migrant workers or ageing workers)
- evaluating the risks and deciding on the appropriate controls/precautions, taking into account the controls you already have in place
- recording the risk assessment
- reviewing and updating the assessment

› Annually

- › Significant changes; legislation, working practices, environmental conditions
- › Accident serious incident or near miss
- › Where the assessment is no longer valid

## Risk Rating Matrix

The Group recognises that using a risk-rating matrix can be helpful for prioritising actions to control a risk. It is suitable for many assessments but in particular to situations that are more complex trained staff with appropriate expertise and experience can use the risk-rating matrix below in order to judge the likelihood of harm accurately. The Head of Health and Safety can be contacted to support.

Risk Rating Scoring – 5 x 5 Matrix								
Levels of Risk		Consequence					Residual Risk	Level of Approval/ Notification Required
		No impact (1)	Minor (2)	Medium (3)	Major (4)	Catastrophic (5)		
Likelihood	Very Unlikely (1)	1	2	3	4	5	1 – 4	No approval required to proceed.
	Unlikely (2)	2	4	6	8	10	5 – 9	Where possible make improvements at next review
	Fairly Likely (3)	3	6	9	12	15	10 – 16	Line manager must review and reduce residual risk where possible. Line manager must approve final risk assessment before activity proceeds.
	Likely (4)	4	8	12	16	20		
	Very Likely (5)	5	10	15	20	25	17 - 25	Stop the activity, the head of service/ Group H&S Manager must approve prior to activity commencing.

**Risk Rating = Likelihood score X Consequence score** - If the score is low due to existing control measures already in place, then these must be maintained to sustain high standards

### 8.2.2. Risk Assessments Children & Young People

Risks are assessed when teaching children and young people or when they move into living accommodation and the action necessary is identified to manage the risks to staff.

The health and safety risks are assessed at the same time as agreeing children and young people educational, life skill, living needs and care plans as appropriate.

Typical activities considered as part of the assessment include

- Moving and handling of children and young people with physical disabilities
- Working with children and young people unable to recognise everyday hazards, communicate distress, or move around independently
- Use of mechanical aids and equipment
- Using therapy and ball pools
- Administering medical treatment
- Minimising the risk of infection
- Management of difficult behaviour and the use of restraint e.g. children and young people who potentially are a danger to themselves, other students and staff
- Lone working
- Transport issues
- Access to social and education activities and work placements and work experience.

Educational, life skill living needs and plans are monitored and reviewed as part of a formal process and when care plans change.

In anticipation of the of the reasonable adjustment duty in the Equality Act certain adjustments are already in place or made available in the sites to accommodate needs as put in place by the Accessibility Plan with the intention for improving the physical environment of the site for the purpose of increasing the extent to which disabled children and young people are able to take advantage of education, benefits, facilities and services provided or offered by a service within the Group. Plans

cover matters other than premises relating to participation in curriculum or community by, and delivery of information to, disabled children and young people, for instance by appropriate provision of equipment.

### 8.2.3. Curriculum

Management are reminded that scope of the HSE classroom checklist does not cover drama and sports facilities or specialist classrooms, including laboratories, art, IT, design and technology facilities. In these specific environments, where more specialist equipment and/or substances are in use, risk assessment and management appropriate to the activities should be put in place.

The HSE website includes information for the education sector to support

- Students with a disability with SEN/ASN
- Students with a disability who do not have SEN/ASN
- Students who do not have a physical disability, but have SEN/ASN to address behaviour problems

Wherever possible, CLEAPSS guidelines should be followed. The CLEAPSS helpline and portal is accessed by each site. The Head of Health and Safety retains a list of individuals who have been given access to the CLEAPSS information portal.

### 8.2.4. School & College Trips and Community Trips for Residential Provisions

The focus for any trip should be on how the real risks arising from such visits and the needs of the children or young people taking part are managed. Paperwork should have a proportionate and sensible approach for planning and organising off-site activities.

Wherever possible, staff organising visits and trips should simplify the planning process and arrangements for visits that involve everyday risks.

The HSE has produced a number of case studies for the special school educational needs to illustrate and encourage proportionate responses to the planning and delivery of school visits and should be referred to in advance.

In all cases the needs including the needs of the children and young people including medication and first aid needs of those taking part must be taken into account.

### 8.2.5. Joint Contractor Risk Assessments

The Group recognise that some of the risks in premises under the control of the Group may not be obvious and therefore joint Contractor Risk Assessments are undertaken. Contractors are told about any specific risks within the premises e.g. the presence of asbestos in advance of work. Method statements or safe systems of work will be sourced and shared as appropriate.

Contractors are required to let the Group know in advance of any additional risks they will be introducing to the estate and work will not start until the Contractors fully understand the risks and measures to control them.

## 8.3. Health Surveillance

The Group has in place a process to carry out Health Surveillance where it is required by specific health and safety regulations, where assessment identifies it should be introduced or where there is reasonable likelihood that the disease or condition may occur under the particular conditions of the work.

This type of health surveillance is different from

- Health assessments requested by night staff
- Staff fitness to work examinations

The level of health surveillance will depend on the risks and may range from the completion of an annual health questionnaire independently checked by a qualified responsible person for low risks or

referral for health surveillance assessment in the event of a confirmed case by an HSE registered doctor for high risks (see\* in the table below below).

A health record is kept by the Director of People for all staff members under health surveillance in compliance with the Group GDPR Policy and kept for at least 40 years.

The Group Profile has identified the need for health surveillance if the work involves

Using vibrating hand tools plant and equipment when carrying out grounds maintenance with the potential to cause hand arm vibration syndrome	The Control of Vibration at Work Regulations 2005
Exposure to loud noise when using machinery plant and equipment	Noise at Work Regulations 2005
Exposure to hard and soft wood dust, welding fumes and solder, solvents, varnish, paints, cleaning agents with the potential to cause asthma or dermatitis	Control of Substances to Health Regulations 2002 (as amended)*
Possible exposure to asbestos fibre when monitoring its condition or involved with its removal or encapsulation or unlikely disturbance	Control of Asbestos Regulations 2012*
Exposure to lead	Control of Lead at Work Regulations 2002*
Exposure to ionising radiations	Ionising Radiations Regulations 2017*

\*Note: The Director of People is responsible for medical health surveillance making high level statutory medical surveillance referrals which must be carried out by a doctor appointed for these purposes by the HSE.

## 8.4. Organising

### 8.4.1. Supervising Staff for Health and Safety

The Group provides supervision that is both adequate and appropriate.

Staff and volunteers (where appointed) who are not competent (to undertake whatever task) are adequately supervised coached helped and guided by Supervisors until such time as they become and remain competent and understand the risks and the controls associated with them. The staff induction training includes the procedures in place to raise concerns.

Supervision may also be identified in a risk assessment as a risk action control measure e.g. supervising a delivery while its unloaded. All supervisory staff are trained to carry out their role and responsibilities.

### 8.4.2. Supervising Children & Young People for Health and Safety

The Group follow Government guidance on supervising the activities of staff and volunteers wherever and as necessary with children & young people. The Group will ensure compliance with The Childcare (General Childcare Register) Regulations 2008 and the DfE Statutory framework for the early years foundation stage Setting the standards for learning development and care for children from birth to five as it applies to service provision (e.g. breakfast clubs, after school clubs etc.).

### 8.4.3. School Trips

Children & young people to staff ratios for school trips are not prescribed in law. Those planning education trips, on the basis of risk assessment, should decide the ratios, taking into account the activity to be undertaken and the age and maturity of the children & young people.

## 8.4.4. Managing Contractors

The person who is responsible for the appointment ensures that only competent approved contractors and self-employed people who provide a service, carry out all works on behalf of the Group and in Group occupied areas.

The Group has Management of Contractors Policy and Procedure (AS11, AS11.1) to ensure contracted works are effectively managed.

The following rules apply to all contracted works:

- Being clear about the work the contractor is expected to do and the standards of competence required
- Clear communication lines
- Pre start communication, progress meetings supervision and monitoring arrangements
- Areas to discuss and agree prior to contractor works to include:
  - whereabouts of asbestos or other hazardous materials/situations prior to work being carried out where it exists
  - fire and other emergency procedures
  - accident reporting and first aid arrangements
  - parking, traffic management, access, security storage arrangements (even temporary)
  - toilet and welfare facilities
  - cooperation with others arrangements and areas to avoid
  - safeguarding measures
  - who will supervise the work and how
  - monitoring arrangements and standard checks to ensure compliance with agreed terms
  - management of waste
  - Allocation of sufficient time and resources
  - Stopping work if there are serious safety concerns report accidents and incidents and investigate
  - All works are subject to risk assessment and method statements (RAMS) and Permit to Work and Hot Work Permits where these apply (share and exchange RAMS)
  - Checking people understand the risks if English is not the 1<sup>st</sup> language or in event of disability
  - Communication of specific risks
  - Equipment and machinery is isolated
  - PPE

The person responsible for the appointment of contractors or self – employed people, evaluates and monitors contractor competency and performance with the Head of Health and Safety giving assistance and input using the Contractors Policy.

### **Disclosure and Barring Checks:**

Contractors and self – employed people will be obliged have a Disclosure and barring service check prior to work.

## 8.4.5. Maintenance and Grounds Maintenance

The Group will comply with the obligations of The Workplace (Health, Safety and Welfare) Regulations 1992, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, The Children's Homes (England) Regulations 2015, The Education (Independent School Standards) Regulations 2014.

The Estates Director has oversight of the proactive planned maintenance programme as supported by Regional Area Managers and Site Managers to ensure its successful implementation, monitoring and feedback. The scope of planned proactive maintenance programme includes

- Compliance
- The highlighting of urgent repair priorities
- Coordination and cooperation arrangements to minimise living working learning disruption
- Engineering and Facilities Management
- Planning of Design and Construction (CDM projects)

A scheme of works maintenance and testing schedule for each estate premises by the Site Maintenance Team - These arrangements must make sure that they meet the requirements of current legislation and guidance, manufacturers' instructions and the provider's policies or procedures.

Regular reports by the Estates Director to the Board to confirm the Group is complying with all necessary legal requirements relating to the occupation of the estate, including;

- Health and safety law and other relevant laws and regulations as it applies to estates property facilities plant and machinery
- Planned preventative maintenance
- Statutory inspection and testing

Scheme of works to be prioritised and monitored by the Site Management Team and actions monitored by the Estates Team and Head of Health and Safety to ensure they are actioned.

Only suitably qualified maintenance personnel are permitted to carry out maintenance tasks and activities including monitoring checks.

## 8.4.6. Construction Design and Management

The Construction Design and Management Regulations require ALL construction projects including installation, build, dismantling, demolition to be planned and executed by competent persons and with due regard for the health, safety and welfare of everyone involved. The Estates Director takes the lead on all Group related CDM projects, and the Head of Health and Safety will be called upon to give advice and guidance as necessary.

## 8.5. Co-operation

The Group recognise where its workplaces are shared with others (whether on a temporary or permanent basis), we need to co-operate with each other and take all to comply with respective health and safety obligations. These requirements apply to self-employed people where they share a workplace with other employers or where they share a workplace with other self-employed people.

The Quality Assurance Director as the Health and Safety Board Lead / Estates Director retains a complete record of all legal or controlling interests in the Group estates e.g. legal deeds and agreements. Suitable arrangements are put in place for full co-operation between all parties including 3<sup>rd</sup> party hire and community organisations with regular liaison arranged as appropriate with any relevant fire and other emergency plans shared and coordinated.

### 8.5.1. Worker Involvement

Staff are routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review team meetings or sooner if required and through their

staff representative. Staff representatives help the Group manage health and safety in a practical way by

- Helping the Group spot workplace risks
- Making sure health and safety controls are practical
- increasing the level of commitment to working in a safe and healthy way
- Providing the Group with feedback on the effectiveness of your health and safety arrangements and control measures.

Deficiencies should be dealt with as they arise and not left until the team or when the health and safety sub-committee meet.

A typical team or sub-committee meeting agenda and discussion held with staff include the following:

- Strategic policy and targets
- Statistics on accident records, ill health, sickness absence, near miss, safeguarding behaviour, errors - the aim is to stop them happening again, not to give blame
- Accident investigations etc. and subsequent action
- Inspections of the workplace by enforcing authorities, management, H&S managers consultants reps.
- Risk Assessments and information
  - Risks arising from their work
  - Proposals to manage and/or control these risks
  - What to do if employees are exposed to a risk
  - The best ways of providing information and training
- Health and safety training
- Emergency procedures / items; and
- Changes in the workplace affecting the health, safety and welfare of staff and others (pupils etc)

Any person bringing an item before team meetings / sub-committee should be expected to 'make a case' explaining thoroughly the problem and recommending, if possible, solutions.

The needs of any vulnerable staff (temporary or agency staff, or those whose first language is not English), will be appropriately met, including through for example.

- The use of interpreters
- Use of symbols and diagrams rather than written instructions
- Posters and signage

Consultation arrangements are incorporated into the staff induction training programme with the Local Lead contact details identified on the HSE posters on notice boards.

### 8.5.2. Letting Agreements

Formal lettings agreements are put in place where the premises (or part of the premises to be occupied e.g. living, leisure, community activity, working etc.) are let to others for a short term hire or as part of a lease agreement are retained on site. The letting agreement states such safety arrangements as maximum numbers permitted access, emergency arrangements, defect reporting arrangements, security and any other information to ensure that hirers comply with school/estate existing safety requirements. 3<sup>rd</sup> party insurance is obtained prior to letting agreement and regular meetings held.



## 8.5.3. Emergency Planning and Co-operation with Emergency Services

Each estate has a Business Continuity Plan in place and supplemented with clearly agreed, recorded and rehearsed plans for emergencies and special procedures that identify actions and responsibilities, to deal with serious injuries and incidents (see summary outline below) and coordinating with the emergency services. Emergency plans are kept under review.

Each estate is suitably and clearly signed at the entrance to alert the emergency services (remote estates are grid marked and referenced). Staff work on duty rotas including night and shift working, weekends and times when the premises are closed during the holidays. Duty staff are well trained with arrangements included in induction and competent take part in regular and realistic practice with pupils and service users taking part in drills where they are included in the response to ensure they feel safe.

Where the Group shares the workplace with another employer, emergency plans and procedures are coordinated and communicated.

## 8.5.4. Danger Areas

Danger areas have been identified clearly with signage with access restriction measures in place and subject to monitoring. Danger areas have been identified in the Estate Risk Profiles and should be referred to. These include but not limited to

- Asbestos
- Chemical Storage Areas (Cleaning, Science Lab and Pools)
- Fuel Storage Areas
- Electrical Intake Fuse Boxes
- Electricity Sub Stations
- Plant Rooms
- Powered Gates
- Roof Access and Fragile Roofs
- Swimming and Hydrotherapy Pools
- Traffic Routes and Parking / Drop Off
- Water Features – Ponds
- Workshops Equipment Tools Plant Storage
- Classroom Equipment (fume cupboards, kilns, band saws etc)
- Access to commercial kitchens

## 8.6. Communication and Information

The managers are responsible for the provision of adequate information to employees and others affected by our work activity. If employees are concerned that the information they receive is inadequate, lacks clarity, or needs to be translated in order to maintain their own and others safety, it is their duty to inform their supervisory manager accordingly. Similarly, employees are expected to take reasonable steps to familiarise themselves with published information and to take notice of it.

Individual employees are responsible for co-operating with management to meet the requirements of these arrangements. They must swiftly bring to their immediate manager's attention any weaknesses in these arrangements so that additional control action can be implemented.

The GDPR Policy must be followed to ensure confidentiality of data and records

Information relating to health, safety and the environment is conveyed to employees and others who may be affected, in one or more of the following ways:

- Risk Assessments
- Emails
- Group newsletter
- Team meetings
- Notices on notice boards
- Signage
- Employee handbooks
- HSE law poster
- Tool box talks
- Access to specialist information (Health and Safety Consultant, CLEAPSS etc)
- Emergency Plans and Emergency Contact Numbers

The Group celebrates and recognise health and safety performance and good practice by including articles in the Group newsletter e.g. by team staff recognition and on the website. Good performance is also acknowledged by the Board and rewarded at Group events attended by staff (annual conference).

Children and Young People receive information in a way that is suited to their needs.

## 8.7. Competence

Competence is generally accepted as the ability to apply practically a mix of knowledge, skills, experience or other qualities to a particular task. An individual should be sufficiently competent to not only carry out the routine task, but to be able to cope with unexpected changes and/or situations that may arise.

It is not appropriate just to rely on the assumption that someone is capable of carrying out a task because it is perceived to be just 'common sense'.

The Group recognises that it is duty bound to determine the levels of competence held by making reasonable enquiries of individuals.

### 8.7.1. Competent Health and Safety Advice

#### Head of Health and Safety

The Group recognises its obligation under The Management of Health and Safety at Work Regulations 1999 to offer access to competent health and safety assistance to help with compliance of relevant statutory provisions to actively improve safety and to drive safety issues forward.

#### Health and Safety Consultants

In order to provide competent and expert advice in areas such as Legionella, Fire Safety and Asbestos (amongst others) The Aurora Group will utilise Health and Safety Consultants. The consultant will be chosen based on their experience, support provision and value for money. The consultant is there to provide The Head of Health & Safety, as well as the Executive and Central Team, with assistance in order to meet the objectives of this Policy and our obligations under The Health and Safety at Work Act and other supporting legislation and regulations.

The consultancy provision will be regularly reviewed, to ensure the Group is receiving the best possible service.

## 8.8. Capabilities and Training

**Employees:** (See also Contractors)

Training helps people gain the skills and knowledge, and ultimately the competence, to carry out their work safely and without risk to their health.

The Group recognises training isn't just about formal 'classroom' courses – and is delivered in a number of ways

- Informal 'on the job' training
- Written instructions
- Online information
- Simply telling someone what to do

Staff, subcontractors and self-employed are given necessary health and safety induction and provided with appropriate training (including safeguarding, first aid, accident reporting, fire awareness, risk assessment, consultation, work equipment, working at height, asbestos awareness, infection control and electrical safety) and personal protective equipment. Additional core training will be identified in accordance with specific job roles e.g. Care Certificate, Legionella, maintenance checks etc.

Employees are reminded that they also have responsibilities under health and safety law to:

- take care of their own health and safety and that of others
- co-operate with the Group to help the Group to comply with health and safety legislation;
- follow any instructions or health and safety training provided
- inform Line Manager about any work situations that present a serious and imminent risk
- inform Line Manager about any failings they identify in your health and safety arrangements.

The Group will ensure that suitable arrangements are in place to cover employees engaged in work remote from their main workplace, those returning from long term sickness absence.

Health and safety training and refresher training (as necessary e.g. in event of change or working practices or equipment being introduced etc) will be provided at no cost to the employee and training records will be retained by the relevant Manager and copies held centrally by the Director of People.

## Children and Young People

The Group will include the people we care for and support in the health and safety training programme where they are likely to be affected to ensure they feel safe. This will form part of the curriculum wherever possible and communicated by teaching and care support staff in a manner that is understood and in accordance with their needs.

- Induction training - tour of the school site (no go danger areas, security arrangements, welfare arrangements, obtaining fresh drinking water etc)
- Fire awareness
- How to summon first aid or special assistance
- How to recognise and report serious problems dangers and accidents
- Safeguarding and e-safety
- Cycling and road safety in the community
- Using machinery, equipment and PPE safely

Staff training take up will be monitored and notified to the Board by the Learning and Development Manager.

### 8.9. Specialist Help

The Group calls upon specialist or consultant help and to contribute to the overall safety management.

In addition to the External Health and Safety Consultancy, useful sources of advice may include

- Trade associations
- Safety groups
- Trade unions
- Commissioning organisations and Health Authorities
- Health and safety training providers
- Health and safety equipment suppliers
- Noise and vibration specialists
- Occupational health professionals (doctors and nurses)
- Occupational hygienists
- Occupational therapists
- Physiotherapists
- Radiation and radon protection advisers
- Specialist engineers
- Tree surgeons

## 8.10. Implementing the Group Plan

The COO sets Group targets and monitors the actions to ensure they are achieved and successfully implemented with the necessary resources made available to ensure success.

Resources include

- Human resources
- Specialised skills
- Organisational infrastructure
- Technology
- Financial resources

Special Arrangements are in the Health and Safety Policy sub document. Arrangements include a list of safety rules to give focus to those responsible for taking action.

The implementation and compliance with the targets and rules are assessed by

- Auditing safety procedures and practices to determine compliance - snap unannounced, formal, by the Head of Health and Safety with findings reported to each relevant Manager
- Monitoring - checklists completed, random investigation, follow up, inspections, sample checks by the individual or team responsible, the Group Health and Safety Manager, the Independent Health and Safety Consultancy.
- Monitoring and supervision of staff and Contactors to give assurance staff and contractors are following workplace precautions and risk controls

Local teams include the Site Lead, Business Managers, Head of Health and Safety and others e.g. formal staff safety reps, Regional Estates Managers, have been set up to focus on targets and the rules to keep it moving, with the Head of Health and Safety giving feedback to the Board on success and shortfalls to ensure prompt action can be taken. Results of progress reviews feed into future training plans to help with continuous improvement and avoids complacency.

Everyone on the team has access to the details of the safety management system, associated policies and documents where there are risk and what part they play. Access includes online reporting

recording and monitoring systems so they can see what is in place and what is to be actioned in order of priority.

Safety management involves everyone in the Group and requires that individuals change their behaviours in order to prevent incidents. Staff are trained how to identify and control hazards and actively encouraged to take part, contribute and monitor implementation through their consultation forums team meetings or by bringing it to the attention of their supervising manager etc.

The curriculum for children and young people includes the recognition of hazards risks and dangers who are encouraged to make a contribution to help keep them and their friends' safe whilst learning and / or living in accommodation provided by the Group.

Precautions are put in place to control high hazard activities are more detailed where they are to be strictly followed e.g. a permit to work, emergency response, safeguarding procedure to protect vulnerable people etc.

Risk assessments and workplace precautions are reviewed in the light of changes and technological developments. The type, frequency and depth of maintenance should reflect the extent and nature of the hazard and risks revealed by risk assessment. The balance of resources devoted to the various risk control systems will also reflect the Risk Profile of the Group.

### 8.10.1. Records & Documents

Current up to date health and safety records and documents are made clear, kept functional, concise, retained, shared and made available in line with the Group GDPR Policy and the Quality Management system document control.

Certain individuals will retain specific documents for which they have responsibility implementation and monitoring oversight

- The Quality & Governance Administrator - Compliance
- Director of People – Health surveillance / ill health
- Group Estates Director
  - > Minutes
  - > Central Maintenance Records
  - > A complete record of all legal or controlling interests in the Group estates.
  - > Contractor records
- Group Safety Manager and the Quality Assurance Director – Health and safety documents

Each site will retain an up to date set of health and safety files of all health and safety management system documents and records. This file must be kept in an accessible location for all on site and be readily available upon request at all times.

The central file for each site is supported by other health and safety files at the use e.g. workshops, catering kitchens, classrooms, chemical storage and plant rooms etc.

### 8.10.2. Licence Notification Registrations

Licence notifications and registrations are notified to and managed by the Quality & Governance Administrator who retains the records with the original retained locally in the site Health and Safety File. Certificates of Registration are displayed on the notice board in the reception areas.

## 9. Check

### 9.1 Measuring Performance

Effective monitoring and reporting arrangements have been put in place by the Group to make sure plans put in place have been implemented and how well the risks are being controlled.

## 9.1.1 Proactive Monitoring

Regular checks are made to ensure the Group is managing risks, identify ways to make improvements and give early warning of difficulties.

The various active monitoring activities include:

- Routine inspection programme of workplaces, estates; grounds, plant, equipment by staff
- Planned function check regimes for key pieces of plant
- Audits (general and topic specific)
- Health surveillance to prevent harm to health
- Checking risk assessment compliance and inclusion of significant risks on risk registers
- Reporting of safety related training uptake
- Quarterly board report submitted to the Board
- Asking children/young people if they feel safe as part of a survey / questioning

## 9.1.2 Reactive Monitoring

The reactive monitoring methods put in place by the Group monitor evidence of poor health and safety practice but can also identify better practices.

The various reactive monitoring activities include:

- Investigating and reporting accidents, incidents, near miss
- Review of RIDDOR and notification data at corporate / local level
- Monitoring cases of ill-health and sickness absence including stress data
- Review of health and safety incidents

Reactive Monitoring systems put in place by the Group answer the following questions:

- Are failures occurring (injuries/ill health/loss/incidents)?
- Where are they occurring?
- What is the nature of the failures?
- How serious are they?
- What were the potential consequences?
- What are the reasons for the failures?
- What are the costs?
- What improvements in the health and safety management system are required?
- How do all the above points vary with time?
- Are we getting better/worse?

### Investigating Accidents Incidents Near Misses

Accidents, incidents, near misses, occupational diseases will be investigated by trained nominated staff to prevent reoccurrence.

Investigations wherever carried out will:

- establish and describe what happened with photo evidence captured
- identify the reasons for substandard performance
- identify the underlying failures in the health and safety management system
- learn from events
- prevent recurrences; and satisfy legal and reporting requirements.

## 10. Act

### 10.1 Reviewing Performance and Learning Lessons

- Regular reviews of health and safety related policies will take place
- Regular assessment updating review of Risk Registers (corporate / local) staff consultation forums and by the Head of Health and Safety
- Review of incidents and communication of findings
- Lesson learning is completed at all levels and through corporate governance for some incidents such as notifications made to Regulators.

### A-Z Arrangements on sub policy

1. Accident Incident Regulatory Notification Reporting
2. Animals and Pets
3. Asbestos
4. Challenging Behaviour
5. Control of Contractors
6. Control of Substances Hazardous to Health
7. Display Screen Equipment (DSE)
8. Electricity
9. First Aid and Medical Emergency
10. Fire
11. Fuel Storage and Delivery
12. Gases
13. Heights
14. Infection Control
15. Insurance
16. Manual Handling
17. Medication
18. Noise
19. Personal Protective Equipment
20. Plant Machinery Tools Equipment
21. Pressure Systems
22. Pregnancy and New Mother
23. Safeguarding
24. Safety Signs and Pipe Marking
25. Stress Mental Health Sickness Absence
26. Traffic Management and Routes
27. Water Systems – legionella and scalding
28. Workplace and Living Accommodation
29. Young Persons and Work Experience